

UNITED STATES BANK COURT  
EASTERN DISTRICT OF NEW YORK

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Case No. 20-41001-cec

In re:

Chapter 11

VADIM GOVOROV

NOTICE OF MOTION

Debtor.

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PLEASE TAKE NOTICE that upon the annexed application of Vadim Govorov, through his attorney, Pablo E. Bustos, Esq., a hearing will be held before the Honorable Judge Carla Craig on August 5, 2020, or soon thereafter as Counsel can be heard for an order pursuant to 11 U.S.C. § Section 1112 dismissing the above-entitled bankruptcy case.

PLEASE TAKE FURTHER NOTICE that any responsive papers should be filed with the Court and served on the United States Trustee at 201 Varick Street, Suite 1006, New York, New York 10014, to the attention of Reema Lateef, Esq. seven (7) days prior to the hearing. Such papers shall conform to the Federal Rules of Civil Procedure and identify the party on whose behalf the papers are submitted, the nature of the response, and the basis for such response.

WHEREFORE, the United States Trustee respectfully requests that this Court dismiss the current Chapter 11 Bankruptcy Case, or grant such other relief as the Court deems just, fair, and equitable.

Date of Hearing: August 5, 2020 at 2:00 PM

Location of Hearing: 271 Cadman Plaza East, Courtroom 3529  
Brooklyn, New York 11201  
Before the Honorable Bankruptcy Judge  
Carla Craig

Dated: July 21, 2020  
New York, New York

Sincerely,

/s/

Pablo E. Bustos, Esq.  
70 West 40<sup>th</sup> Street, 8<sup>th</sup> Floor  
New York, New York 10018

UNITED STATES BANK COURT  
EASTERN DISTRICT OF NEW YORK

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Case No. 20-41001-cec

In re:

Chapter 11

VADIM GOVOROV

AFFIRMATION IN SUPPORT OF  
MOTION FOR DISMISSAL

Debtor.

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TO THE HONORABLE JUDGE OF THIS COURT:

The Debtor, VADIM GOVOROV, pursuant to 11 U.S.C. §362(c)(3)(B), requesting an order dismissing the Debtor's Chapter 11 Petition pursuant to Section 1112.

The above referenced case was commenced on February 19, 2020 by the filing of a voluntary petition under Chapter 11 and has not been converted under 11 U.S.C. §§ 706, 1112, or 1208;

There is no motion for relief from, annulment of, or conditioning of the automatic stay pending in this case and no such motions have been filed in this case.

Debtor has made no arrangements or agreements with any creditor or any other person in connection with this request for dismissal.

The Debtor prays to have his Chapter 11 Petition dismissed because he believes he cannot confirm his Chapter 11 Plan. He has instructed his lawyers to proceed with whatever relief may be available to him outside of Bankruptcy Court.

Sincerely,

/s/

Pablo E. Bustos, Esq.  
Attorney for Debtor  
70 West 40<sup>th</sup> Street, 8<sup>th</sup> Floor  
New York, New York 10018

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: July 21, 2020

\_\_\_\_\_  
/s/  
Vadim Govorov, Debtor

UNITED STATES BANK COURT  
EASTERN DISTRICT OF NEW YORK

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Case No. 20-41001-cec  
In re:  
Chapter 11  
VADIM GOVOROV  
ORDER  
Debtor.  
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**ORDER OF THE BANKRUPTCY JUDGE**

Upon consideration of the Debtor's Motion to Dismiss, it is HEREBY ORDERED that the motion be **\_ GRANTED \_ DENIED** because:

- ☐ Good cause has been established for the motion.
- ☐ The court agrees with the reasons stated in the opposition to the motion.
- ☐ The motion is untimely per \_\_\_\_\_.
- ☐ Other:

Date: \_\_\_\_\_  
Honorable Bankruptcy Judge Carla Craig

UNITED STATES BANK COURT  
EASTERN DISTRICT OF NEW YORK

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Case No. 20-41001-cec

In re:

Chapter 11

VADIM GOVOROV

CERTIFICATE OF SERVICE

Debtor.

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This is to certify that I, Pablo E. Bustos, Esq., declare under penalty of perjury that I have sent the attached document to the below listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Notice to the following persons was sent by electronic transmission generated by the ECF System to the following person/entities on July 21, 2020 :

Pablo Bustos on behalf of Debtor Vadim Govorov  
[pbustos@bustosassociates.com](mailto:pbustos@bustosassociates.com)

Elizabeth L Doyaga on behalf of Creditor Select Portfolio Servicing, Inc. as servicer for U.S. Bank NA, successor trustee to Bank of America, NA, successor in interest to LaSalle Bank National Association, on behalf of the registered holders  
[edoyaga@flwlaw.com](mailto:edoyaga@flwlaw.com), [jspiegelman@flwlaw.com](mailto:jspiegelman@flwlaw.com)

Office of the United States Trustee  
[USTPRegion02.BR.ECF@usdoj.gov](mailto:USTPRegion02.BR.ECF@usdoj.gov)

Dated: July 21, 2020  
New York, New York

Sincerely,

/s/

Pablo E. Bustos, Esq.  
70 West 40<sup>th</sup> Street, 8<sup>th</sup> Floor  
New York, New York 10018